

REMARKS

Claims 2-9, 12-14, 17-21 and 23-29 are currently amended and claims 1-29 remain in the application for consideration. In view of the following remarks, Applicant traverses the Office's rejections and respectfully requests that the application be forwarded on to issuance.

Priority

The Office argues that claims 1-29 are not entitled to the provisional application's priority date as an effective filing date because the provisional application allegedly does not contain all the features of the claimed embodiments. The specific features cited by the Office as missing from the provisional application are listed and addressed below.

1. The second event filter being associated with an event consumer. The feature of filters associated with consumers is discussed throughout the provisional application and is specifically shown in the schema diagram shown at the bottom of page 7. Therein are disclosed two different sets of filters, one associated with a transforming consumer and another associated with an action consumer. Thus the provisional application discloses a second event filter associated with an event consumer that receives events.
2. The event consumer performs an action if the second event satisfies the filter criteria associated with the second event filter. As explained above, the schema diagram on page 7 shows an inline filter preceding an action consumer. As can easily be seen, if an event does not satisfy the criteria associated with the filter, the action consumer will not be able to act upon the event. Thus this feature is also disclosed by the provisional application.
3. The second event filter has no knowledge of the first event. This particular feature is discussed on page 2 of the provisional application, which explains that "[t]he standard properties of the EEL event facilitate the decisions the infrastructure needs to make to *filter and forward the events without being knowledgeable of the original event structure*"

(emphasis added). Thus it is disclosed that the filter policies need not be knowledgeable of the original (i.e. first) event.

4. Generating an event header. This feature is discussed in one embodiment on page 15 of the provisional application. As explained in claim 11, the feature of generating an event header is part of the feature of transforming a first event into a second event. On page 15 of the provisional application is explained the transformation policy associated with an event filter. This policy includes generating an event and supplying all the required properties for an event, such as for example event ID, source type, category, priority, etc. These properties are all considered typical to an event header. Thus the provisional application provides support for the feature of generating an event header.
5. The event transformer operates independently of the event filters and independently of the event consumers. As is shown in the schema on page 7 of the provisional application, the transforming consumer (event transformer) is separate from and thus operates independently from the event filters and the action consumers.

Accordingly, Applicant submits that the claims are supported by the provisional application and thus properly claim the benefit of the provisional priority date as their effective filing date. Specifically, Applicant respectfully submits that the provisional application is replete with functional descriptions, data models, schemas, architectural diagrams and specific examples that embrace the subject matter of claims 1-29. Accordingly, Applicant respectfully traverses the Office's rejection.

Double Patenting Rejections

Claims 1-29 stand provisionally rejected under the doctrine of obviousness-type double patenting as allegedly being unpatentable over claims 1-17 of copending Application No. 2005/0071849 to Hinson, et al. Applicant respectfully requests that the Office hold this rejection in abeyance until the indication of allowable subject matter.

1 Claims 1-29 stand provisionally rejected under the doctrine of obviousness-
2 type double patenting as allegedly being unpatentable over claims 1-20 of
3 copending Application No. 2005/0044554 to Hinson, et al. Applicant respectfully
4 requests that the Office hold this rejection in abeyance until the indication of
5 allowable subject matter.

6 Claims 1-29 stand rejected under the doctrine of obviousness-type double
7 patenting as allegedly being unpatentable over claims 1-25 of U.S. Patent No.
8 6,748,455 to Hinson, et al. Applicant respectfully requests that the Office hold
9 this rejection in abeyance until the indication of allowable subject matter.

10 Claims 1-29 stand rejected under the doctrine of obviousness-type double
11 patenting as allegedly being unpatentable over claims 1-9 of U.S. Patent No.
12 6,829,770 to Hinson, et al. Applicant respectfully requests that the Office hold
13 this rejection in abeyance until the indication of allowable subject matter.

14 Claims 1-29 stand rejected under the doctrine of obviousness-type double
15 patenting as allegedly being unpatentable over claims 1-15 of U.S. Patent No.
16 6,766,368 to Jakobson, et al. Applicant respectfully traverses this rejection and
17 submits that it is improper for the Office to cite Jakobson in a double patenting
18 rejection of Applicant's claims. MPEP § 804 provides that "[b]efore consideration
19 can be given to the issue of double patenting, two or more patents or applications
20 must have at least one common inventor and/or be either commonly
21 assigned/owned or non-commonly assigned/owned but subject to a joint research
22 agreement...." However, the present Application and Jakobson do not have at
23 least one common inventor, are not commonly assigned or owned and are not
24 subject to a joint research agreement. Accordingly, the Office's double patenting
25

1 rejection of Applicant's claims is improper. Applicant respectfully requests that
2 this rejection be withdrawn.

3
4 **Claim Objections**

5 Claims 2-9, 12-14, 17-21 and 23-29 stand objected to based on their
6 containing, in the opinion of the Office, certain informalities. Applicant
7 respectfully disagrees with these objections, but has nonetheless amended these
8 claims to overcome these objections.

9
10 **§ 102 and § 103 Rejections**

11 In the arguments presented below, Applicant will first address the Office's
12 rejections under § 102 and will then address the Office's rejections under § 103.

13
14 **§ 102 Rejections**

15 Claims 1-29 stand rejected under 35 U.S.C. § 102(e) as allegedly being
16 anticipated by U.S. Patent No. 6,748,455 to Hinson, et al. (hereinafter "Hinson
17 1").

18 Claims 1-29 stand rejected under 35 U.S.C. § 102(e) as allegedly being
19 anticipated by U.S. Patent No. 6,829,770 to Hinson, et al. (hereinafter "Hinson
20 2").

21 Claims 1-29 stand rejected under 35 U.S.C. § 102(e) as allegedly being
22 anticipated by U.S. Patent Pub. No. 2005/0071849 to Hinson, et al. (hereinafter
23 "Hinson 3").

1 Claims 1-29 stand rejected under 35 U.S.C. § 102(e) as allegedly being
2 anticipated by U.S. Patent Pub. No. 2005/0044554 to Hinson, et al. (hereinafter
3 "Hinson 4").

4 Claims 1-29 stand rejected under 35 U.S.C. § 102(e) as allegedly being
5 anticipated by U.S. Patent No. 6,766,368 to Jakobson, et al. (hereinafter
6 "Jakobson").

7 8 The Hinson References

9 Since the disclosures of Hinson 1, Hinson 2, Hinson 3 and Hinson 4
10 (hereinafter "Hinsons 1-4") are substantially the same, Applicant will address the
11 § 102 rejections over Hinsons 1-4 together.

12 As a preliminary matter, Applicant respectfully submits that the Office's
13 rejection of these claims under § 102 fails to comply with the applicable patent
14 laws, regulations and patent office procedures. In rejecting these claims over
15 Hinsons 1-4, the Office merely restates each claim element (sometimes
16 inaccurately) and then simply cites to Hinsons 1-4 at "figures 3-35 and related
17 description". The Office fails to provide any further reasons or explanations as to
18 the particular subject matter of Hinsons 1-4 that allegedly anticipates the subject
19 matter recited in Applicant's claims.

20 35 U.S.C. § 132(a) specifies in pertinent part that:

21
22 [w]henever, on examination, any claim for a patent is rejected, or any
23 objection or requirement made, the Director *shall* notify the applicant
24 thereof, stating the reasons for such rejection, or objection or requirement,
25 *together with such information and references as may be useful in
judging of the propriety of continuing the prosecution of his
application...* (emphasis added).

1
2 To this end, 37 C.F.R. § 1.104(a)(2) requires, in pertinent part, that:

3
4 [t]he *reasons* for any adverse action or any objection or requirement *will be*
5 stated in an Office action and *such information* or references will be given
6 *as may be useful in aiding the applicant*, or in the case of a reexamination
proceeding the patent owner, to judge the propriety of continuing the
prosecution (emphasis added).

7
8 37 C.F.R. § 1.104(c)(2) further requires that:

9
10 In rejecting claims for want of novelty or for obviousness, the examiner
11 must cite the best references at his or her command. When a reference is
12 complex or shows or describes inventions other than that claimed by the
13 applicant, the particular part relied on *must be* designated as nearly as
practicable. *The pertinence of each reference, if not apparent, must be*
14 *clearly explained* and each rejected claim specified (emphasis added).

15 Finally, MPEP § 707.07(d) directs that “[w]here a claim is refused for any
16 reason relating to the merits thereof it should be ‘rejected’ and the *ground of*
17 *rejection fully and clearly stated*...(emphasis added).”

18 In view of the aforementioned requirements, Applicant respectfully submits
19 that the § 102 rejections provided by the Office are insufficient and fail to provide
20 Applicant with *any* useful guidance or information as to the pertinence of the cited
references so that Applicant may proceed with prosecution of the Application.

21 However, despite the Office’s failure to properly examine these claims
22 under § 102, Applicant has thoroughly reviewed the cited references and submits,
23 as explained below, that the references fail to anticipate Applicant’s claims.
24
25

The Claims

Claim 1 recites a method comprising:

- receiving a first event at a first event filter, the first event filter having an associated filter criteria;
- applying the filter criteria associated with the first event filter to the first event;
- if the first event satisfies the filter criteria associated with the first event filter, then:
- transforming the first event into a second event; and
- communicating the second event to a second event filter having an associated filter criteria, the second event filter being associated with an event consumer, wherein the event consumer performs an action if the second event satisfies the filter criteria associated with the second event filter.

In making out the rejection of this claim, the Office argues that its subject matter is anticipated by Hinsons 1-4. Applicant respectfully disagrees and submits that Hinsons 1-4 fail to disclose or suggest all of this claim's recited features.

Specifically, Hinsons 1-4 fail to disclose at least the feature of transforming a first event into a second event. In its rejection of this claim, the Office has altered the language of this feature to recite "*processing* the first event into a second event" (emphasis added). Office Action at page 33. However, this claim clearly recites *transforming* a first event into a second event. As explained above, the Office has failed to provide Applicant any guidance as to the specific section of Hinsons 1-4 that teaches this particular feature. However, a careful review of Hinsons 1-4 reveals that this feature is simply missing from these references.

Accordingly, Hinsons 1-4 fail to anticipate this claim and this claim is allowable.

1 **Claims 2-10** depend from claim 1 and thus are allowable as depending
2 from an allowable base claim. These claims are also allowable for their own
3 recited features which, in combination with those recited in claim 1, are neither
4 disclosed nor suggested by the reference of record.

5 **Claim 11** recites a method comprising:

- 6
- 7 • receiving a first event having a first format;
- 8 • transforming the first event into a second event having a second
9 format, wherein transforming the first event into a second event
10 comprises:
 - 11 • generating an event header having a plurality of parameters, wherein
12 the plurality of parameters are arranged in a standard data format;
13 and
 - 14 • generating an event payload having a plurality of payload objects,
15 wherein the plurality of payload objects identify at least one action
16 to perform in response to the event.

17 In making out the rejection of this claim, the Office argues that its subject
18 matter is anticipated by Hinsons 1-4. Applicant respectfully disagrees and submits
19 that Hinsons 1-4 fail to disclose or suggest all of this claims recited features.

20 Specifically, Hinsons 1-4 neither disclose nor suggest the feature of
21 transforming a first event into a second event having a second format. The
22 Office's rejection has altered the language of this claim to read "*processing* the
23 first event into a second event having a second format" (emphasis added). Office
24 Action at page 34. However, this claim clearly recites *transforming* a first event
25 into a second event having a second format. As explained above, the Office has
failed to provide Applicant any guidance as to the specific section of Hinsons 1-4
that teaches this particular feature. However, a careful review of Hinsons 1-4
reveals that this feature is simply missing from these references.

1 Accordingly, Hinsons 1-4 fail to anticipate this claim and this claim is
2 allowable.

3 **Claims 12-15** depend from claim 11 and thus are allowable as depending
4 from an allowable base claim. These claims are also allowable for their own
5 recited features which, in combination with those recited in claim 11, are neither
6 disclosed nor suggested by the reference of record.

7 **Claim 16** recites an apparatus comprising:

- 8
- 9 • an event transformer to receive a first event and transform the first
10 event into a second event, the second event having a standard data
11 format regardless of the first event data format;
- 12 • a plurality of event filters coupled to the event transformer, the event
13 filters to apply filter criteria to the second event; and
- 14 • a plurality of event consumers coupled to the plurality of event
15 filters, the event consumers to perform an action if the second event
16 satisfies the filter criteria applied by the event filters.

17 In making out the rejection of this claim, the Office argues that its subject
18 matter is anticipated by Hinsons 1-4. Applicant respectfully disagrees and submits
19 that Hinsons 1-4 fail to disclose or suggest all of this claims recited features.

20 Specifically, Hinsons 1-4 neither disclose nor suggest at least the feature of
21 an event transformer to receive a first event and transform the first event into a
22 second event. The Office's rejection has altered the language of this claim to read
23 "an event *processor* to receive a first event and *processing* the first event into a
24 second event" (emphasis added). Office Action at page 34. However, this claim
25 clearly recites an event *transformer* to receive a first event and *transform* the first
event into a second event. As explained above, the Office has failed to provide
Applicant any guidance as to the specific section of Hinsons 1-4 that teaches this

1 particular feature. However, a careful review of Hinsons 1-4 reveals that this
2 feature is simply missing from these references.

3 Accordingly, Hinsons 1-4 fail to anticipate this claim and this claim is
4 allowable.

5 **Claims 17-21** depend from claim 16 and thus are allowable as depending
6 from an allowable base claim. These claims are also allowable for their own
7 recited features which, in combination with those recited in claim 16, are neither
8 disclosed nor suggested by the reference of record.

9 **Claim 22** recites one or more computer-readable media having stored
10 thereon a computer program that, when executed by one or more processors,
11 causes the one or more processors to:

- 12 • receive a first event having a first data format;
- 13 • filter the first event using a first filter criteria;
- 14 • transform the first event into a second event having a second data
15 format if the first event satisfies the first filter criteria, wherein the
16 second data format includes an event header having a plurality of
17 parameters and an event payload having a plurality of payload
18 objects; and
- 19 • communicate the second event to an event action handler if the first
20 event satisfies the first filter criteria.

21 In making out the rejection of this claim, the Office argues that its subject
22 matter is anticipated by Hinsons 1-4. Applicant respectfully disagrees and submits
23 that Hinsons 1-4 fail to disclose or suggest all of this claims recited features.

24 Specifically, Hinsons 1-4 neither disclose nor suggest at least the feature of
25 transforming a first event into a second event having a second data format. The
Office's rejection has altered the language of this claim to read "*processing* the

1 first event into a second event having a second data format” (emphasis added).
2 Office Action at page 35. However, this claim clearly recites *transforming* a first
3 event into a second event having a second data format. As explained above, the
4 Office has failed to provide Applicant any guidance as to the specific section of
5 Hinsons 1-4 that teaches this particular feature. However, a careful review of
6 Hinsons 1-4 reveals that this feature is simply missing from these references.

7 Accordingly, Hinsons 1-4 fail to anticipate this claim and this claim is
8 allowable.

9 **Claims 23-29** depend from claim 22 and thus are allowable as depending
10 from an allowable base claim. These claims are also allowable for their own
11 recited features which, in combination with those recited in claim 22, are neither
12 disclosed nor suggested by the reference of record.

13 14 **The Jakobson Reference**

15 Applicant respectfully submits that the Office’s rejection of claims 1-29
16 over Jakobson under § 102 fails to comply with the applicable patent laws,
17 regulations and patent office procedures.

18 Specifically, for each and every feature of Applicant’s claims argued by the
19 Office, the Office simply refers Applicant to “figures 1-10 and its related
20 description” in Jakobson. However, much like the Office’s § 102 rejections over
21 Hinsons 1-4, this rejection fails to provide Applicant with *any* information that is
22 useful to Applicant in continuing prosecution of this Application.

23 However, despite the Office’s failure to properly examine these claims
24 under § 102, Applicant has thoroughly reviewed Jakobson and submits that, as
25 explained below, the reference fails to anticipate Applicant’s claims.

The Claims

Claim 1 recites a method comprising:

- receiving a first event at a first event filter, the first event filter having an associated filter criteria;
- applying the filter criteria associated with the first event filter to the first event;
- if the first event satisfies the filter criteria associated with the first event filter, then:
- transforming the first event into a second event; and
- communicating the second event to a second event filter having an associated filter criteria, the second event filter being associated with an event consumer, wherein the event consumer performs an action if the second event satisfies the filter criteria associated with the second event filter.

In making out the rejection of this claim, the Office argues that its subject matter is anticipated by Jakobson. Applicant respectfully disagrees and submits that Jakobson fails to disclose or suggest all of this claim's recited features.

Specifically, Jakobson fails to recite at least the feature of transforming a first event into a second event. In its rejection of this claim, the Office has altered the language of this feature to recite "*processing* the first event into a second event" (emphasis added). Office Action at page 52. However, this claim clearly recites *transforming* a first event into a second event. As explained above, the Office has failed to provide Applicant any guidance as to the specific section of Jakobson that teaches this particular feature. However, a careful review of Jakobson reveals that this feature is simply missing from the reference.

Accordingly, Jakobson fails to anticipate this claim and this claim is allowable.

1 **Claims 2-10** depend from claim 1 and thus are allowable as depending
2 from an allowable base claim. These claims are also allowable for their own
3 recited features which, in combination with those recited in claim 1, are neither
4 disclosed nor suggested by the reference of record.

5 **Claim 11** recites a method comprising:

- 6
- 7 • receiving a first event having a first format;
- 8 • transforming the first event into a second event having a second
9 format, wherein transforming the first event into a second event
10 comprises:
 - 11 • generating an event header having a plurality of parameters, wherein
12 the plurality of parameters are arranged in a standard data format;
13 and
 - 14 • generating an event payload having a plurality of payload objects,
15 wherein the plurality of payload objects identify at least one action
16 to perform in response to the event.

17 In making out the rejection of this claim, the Office argues that its subject
18 matter is anticipated by Jakobson. Applicant respectfully disagrees and submits
19 that Jakobson fails to disclose or suggest all of this claims recited features.

20 Specifically, Jakobson neither discloses nor suggests the feature of
21 transforming a first event into a second event having a second format. The
22 Office's rejection has altered the language of this claim to read "***processing*** the
23 first event into a second event having a second format" (emphasis added). Office
24 Action at page 52. However, this claim clearly recites ***transforming*** a first event
25 into a second event having a second format. As explained above, the Office has
failed to provide Applicant any guidance as to the specific section of Jakobson that
teaches this particular feature. However, a careful review of Jakobson reveals that
this feature is simply missing from the reference.

1 Accordingly, Jakobson fails to anticipate this claim and this claim is
2 allowable.

3 **Claims 12-15** depend from claim 11 and thus are allowable as depending
4 from an allowable base claim. These claims are also allowable for their own
5 recited features which, in combination with those recited in claim 11, are neither
6 disclosed nor suggested by the reference of record.

7 **Claim 16** recites an apparatus comprising:

- 8
- 9 • an event transformer to receive a first event and transform the first
10 event into a second event, the second event having a standard data
11 format regardless of the first event data format;
- 12 • a plurality of event filters coupled to the event transformer, the event
13 filters to apply filter criteria to the second event; and
- 14 • a plurality of event consumers coupled to the plurality of event
15 filters, the event consumers to perform an action if the second event
16 satisfies the filter criteria applied by the event filters.

17 In making out the rejection of this claim, the Office argues that its subject
18 matter is anticipated by Jakobson. Applicant respectfully disagrees and submits
19 that Jakobson fails to disclose or suggest all of this claims recited features.

20 Specifically, Jakobson neither discloses nor suggests at least the feature of
21 an event transformer to receive a first event and transform the first event into a
22 second event. The Office's rejection has altered the language of this claim to read
23 "an event *processor* to receive a first event and *processing* the first event into a
24 second event" (emphasis added). Office Action at page 52. However, this claim
25 clearly recites an event *transformer* to receive a first event and *transform* the first
event into a second event. As explained above, the Office has failed to provide
Applicant any guidance as to the specific section of Jakobson that teaches this

1 particular feature. However, a careful review of Jakobson reveals that this feature
2 is simply missing from the reference.

3 Accordingly, Jakobson fails to anticipate this claim and this claim is
4 allowable.

5 **Claims 17-21** depend from claim 16 and thus are allowable as depending
6 from an allowable base claim. These claims are also allowable for their own
7 recited features which, in combination with those recited in claim 16, are neither
8 disclosed nor suggested by the reference of record.

9 **Claim 22** recites one or more computer-readable media having stored
10 thereon a computer program that, when executed by one or more processors,
11 causes the one or more processors to:

- 12
- 13 • receive a first event having a first data format;
- 14 • filter the first event using a first filter criteria;
- 15 • transform the first event into a second event having a second data
16 format if the first event satisfies the first filter criteria, wherein the
17 second data format includes an event header having a plurality of
18 parameters and an event payload having a plurality of payload
19 objects; and
- 20 • communicate the second event to an event action handler if the first
21 event satisfies the first filter criteria.
- 22

23 In making out the rejection of this claim, the Office argues that its subject
24 matter is anticipated by Jakobson. Applicant respectfully disagrees and submits
25 that Jakobson fails to disclose or suggest all of this claims recited features.

Specifically, Jakobson neither discloses nor suggests at least the feature of
transforming a first event into a second event having a second data format. The
Office's rejection has altered the language of this claim to read "*processing* the

1 first event into a second event having a second data format” (emphasis added).
2 Office Action at page 53. However, this claim clearly recites *transforming* a first
3 event into a second event having a second data format. As explained above, the
4 Office has failed to provide Applicant any guidance as to the specific section of
5 Jakobson that teaches this particular feature. However, a careful review of
6 Jakobson reveals that this feature is simply missing from the reference.

7 Accordingly, Jakobson fails to anticipate this claim and this claim is
8 allowable.

9 **Claims 23-29** depend from claim 22 and thus are allowable as depending
10 from an allowable base claim. These claims are also allowable for their own
11 recited features which, in combination with those recited in claim 22, are neither
12 disclosed nor suggested by the reference of record.

13 14 **§ 103 Rejections**

15 Claims 1-29 stand rejected under 35 U.S.C. § 103(a) as allegedly being
16 obvious over U.S. Patent No. 6,470,384 to O’Brien, et al. (hereinafter “O’Brien”)
17 in view of U.S. Patent Pub. No. 2001/0049086 to Paquette, et al. (hereinafter
18 “Paquette”).

19 Claims 1-29 stand rejected under 35 U.S.C. § 103(a) as allegedly being
20 obvious over U.S. Patent No. 5,724,589 to Wold in view of Paquette.

21 Claims 1-29 stand rejected under 35 U.S.C. § 103(a) as allegedly being
22 obvious over O’Brien in view of U.S. Patent No. 5,655,081 to Bonnell, et al.
23 (hereinafter “Bonnell”).

24 Claims 1-29 stand rejected under 35 U.S.C. § 103(a) as allegedly being
25 obvious over Wold in view of Bonnell.

1 In the discussion that follows, Applicant will first address the Office's
2 failure to establish a *prima facie* case of obviousness with regard to each specific
3 combination of cited references. This will be a general, non-claim-specific
4 discussion. Following this, a specific discussion of the claims will be provided.

5
6 **The Combination of O'Brien and Paquette**

7 In its rejection of claims 1-29 of the present Application, the Office admits
8 that O'Brien does not specifically mention the feature of transforming an event or
9 the feature of an event transformer. The Office then argues, however, that
10 Paquette discloses these particular features and that the combination of O'Brien
11 and Paquette thus renders claims 1-29 of the present Application obvious. The
12 motivation provided by the Office to combine O'Brien and Paquette is to:

13
14 facilitate transforming and usage of event transformer because the
15 transforming would enhance converting one event into another event. The
16 event transformer would support implementing the converting. Another
converted event would be available for the system for processing. Office
Action at page 11.

17 Applicant respectfully disagrees with the Office's attempt to combine
18 O'Brien and Paquette and submits that the Office has failed to establish a *prima*
19 *facie* case of obviousness based on this combination of references for at least the
20 reasons discussed below.

21 First, O'Brien does not appear to suffer from any problem that would
22 require the addition of Paquette. The motivation to combine these references
23 provided by the Office (excerpted above) argues that Paquette would allow
24 O'Brien to convert one event into another event. However, O'Brien discloses that:
25

1 In response to the receipt of the network event notification, the manager 25
2 determines the *set of actions to which the network event 7 is associated*
3 using a stored set of event mappings. Each of these action sets 39 group one
4 or more actions 32 and one or more optional event filters 40. If appropriate,
5 the manager 25 causes an actor 9 to perform some task by dispatching an
6 appropriate action 32. O'Brien at column 4, line 66, through column 5, line
7 5 (emphasis added).

8 O'Brien further discloses that:

9 *Each action set 32 is associated with a network event 7* via a mapping
10 table, can store (embed) one or more actions 32, and can reference one or
11 more event filters 40. Moreover, actions sets 45 can be "chained" to invoke
12 subsequent action sets. Column 7, lines 46-50 (emphasis added).

13 Thus, O'Brien discloses that *an* event is associated with one or more
14 actions via a mapping table. Nowhere does O'Brien evince the need for one event
15 to be converted into another event. To the contrary, O'Brien is concerned with
16 generating appropriate actions in response to specific events and apparently would
17 not benefit from the added complication of additional intermediate events in the
18 disclosed event-to-action association process.

19 The Office's *prima facie* case of obviousness fails for the further reason
20 that the Office has failed to provide a proper motivation to combine these
21 references. The Office bears the burden in an obviousness rejection of showing,
22 *inter alia*, that there is some suggestion or motivation, either in the references
23 themselves or in the knowledge generally available to one of ordinary skill in the
24 art, to modify the reference or to combine reference teachings. As such, the mere
25 fact that references *can* be combined or modified does not render a resultant
combination obvious unless the prior art also suggests the *desirability* of the

1 combination. See In re Mills, 916 F.2d 680, 682 (Fed. Cir. 1990). In the present
2 Application, the Office simply argues that it would be obvious to combine these
3 references in order to:

4
5 facilitate transforming and usage of event transformer because the
6 transforming would enhance converting one event into another event. The
7 event transformer would support implementing the converting. Another
8 converted event would be available for the system for processing. Office
9 Action at page 11.

10 However, this argument simply provides a possible *result* of the
11 combination and fails to explain why it would be *desirable* to combine O'Brien
12 and Paquette. Applicant thus submits that this motivation is insufficient to support
13 an obviousness rejection under § 103.

14 Finally, Applicant submits that the Office's attempt to combine the feature
15 of converting one event into another event with O'Brien would impermissibly
16 change an operating principle of O'Brien. As explained above, O'Brien discusses
17 direct event-to-action mapping. Thus, the conversion of an event into another
18 event would needlessly complicate O'Brien and would be contrary to its operating
19 principle of direct event-to-action association.

20 Accordingly, and at least for the reasons discussed above, Applicant
21 submits that the Office has failed to establish a *prima facie* case of obviousness
22 based on the combination of O'Brien and Paquette and respectfully requests that
23 the rejections based on this combination be withdrawn.
24
25

The Combination of Wold and Paquette

In making out the rejection of claims 1-29 over the combination of Wold and Paquette, the Office admits that Wold does not specifically mention the features of transforming an event or an event transformer. The Office then argues that Paquette discloses these particular features and that the combination of Wold and Paquette thus renders these claims obvious. Applicant respectfully disagrees and submits that the Office has failed to establish a *prima facie* case of obviousness based on this combination of references for at least the reasons discussed below.

First, Wold does not appear to suffer from any problem or deficiency that would require the addition of Paquette. Wold discloses, among other things, a development system providing a property-method-event programming model for developing context-free reusable software components. With respect to Wold's handling of events, Wold explains that:

events flow along a chain of "listeners"--an "event chain." As shown in FIG. 7, *the event* of a menu selection may have to go to many receivers. *The event* is, in effect, passed along an event chain 710 to successive objects, some of which may elect to act upon *the event*. At the end of the chain (i.e., after the last member), *the event* dies or, alternatively, is passed back up the chain to the original sender. Wold at column 9, lines 58-65 (emphasis added).

Thus, Wold has provided for event handling across its entire system via a *single event* following an "event chain" and would not benefit from "converting one event into another event", as argued by the Office.

The Office's *prima facie* case of obviousness fails for the further reason that the Office has failed to provide a proper motivation to combine these

1 references. The Office bears the burden in an obviousness rejection of showing,
2 *inter alia*, that there is some suggestion or motivation, either in the references
3 themselves or in the knowledge generally available to one of ordinary skill in the
4 art, to modify the reference or to combine reference teachings. As such, the mere
5 fact that references *can* be combined or modified does not render a resultant
6 combination obvious unless the prior art also suggests the *desirability* of the
7 combination. See In re Mills, 916 F.2d 680, 682 (Fed. Cir. 1990). In the present
8 Application, the Office simply argues that it would be obvious to combine these
9 references in order to:

10
11 facilitate transforming and usage of event transformer because the
12 transforming would enhance converting one event into another event. The
13 event transformer would support implementing the converting. Another
14 converted event would be available for the system for processing. Office
15 Action at page 19.

16
17 However, this argument simply provides a possible *result* of the
18 combination and fails to explain why it would be *desirable* to combine Wold and
19 Paquette. Applicant thus submits that this motivation is insufficient to support an
20 obviousness rejection under § 103.

21
22 Finally, Applicant submits that the Office's attempt to combine the feature
23 of converting one event into another event with Wold would impermissibly
24 change an operating principle of Wold. As explained above, Wold discusses that a
25 *single* event flows along a chain of event listeners, who may perform certain
actions in response to the event. Thus, the conversion of one event into another
event (thus two separate events) would be contrary to Wold's teaching of a single
event flowing along an event chain.

1 Accordingly, and at least for the reasons discussed above, Applicant
2 submits that the Office has failed to establish a *prima facie* case of obviousness
3 based on the combination of Wold and Paquette and respectfully requests that the
4 rejections based on this combination be withdrawn.

5
6 **The Combination of O'Brien and Bonnell**

7 In making out the rejection of claims 1-29 over the combination of O'Brien
8 and Bonnell, the Office admits that O'Brien does not specifically mention the
9 feature of transforming an event or the feature of an event transformer. The Office
10 then argues, however, that Bonnell discloses these particular features and that the
11 combination of O'Brien and Bonnell thus renders claims 1-29 of the present
12 Application obvious. The motivation provided by the Office to combine O'Brien
13 and Bonnell is to:

14
15 facilitate transforming and usage of event transformer because the
16 transforming would enhance converting one event into another event. The
17 event transformer would support implementing the converting. Another
18 converted event would be available for the system for processing. Office
19 Action at page 24.

20 Applicant respectfully disagrees with the Office's attempt to combine
21 O'Brien and Bonnell and submits that the Office has failed to establish a *prima*
22 *facie* case of obviousness based on this combination of references for at least the
23 reasons discussed below.

24 First, O'Brien does not appear to suffer from any problem that would
25 require the addition of Bonnell. The motivation to combine these references

1 provided by the Office (excerpted above) argues that Bonnell would allow
2 O'Brien to convert one event into another event. However, O'Brien discloses that:

3
4 In response to the receipt of the network event notification, the manager 25
5 determines the set of actions to which the network event 7 is associated
6 using a stored set of event mappings. Each of these action sets 39 group one
7 or more actions 32 and one or more optional event filters 40. If appropriate,
8 the manager 25 causes an actor 9 to perform some task by dispatching an
9 appropriate action 32. O'Brien at column 4, line 66, through column 5, line
10 5.

11 O'Brien further discloses that:

12
13 Each action set 32 is associated with a network event 7 via a mapping table,
14 can store (embed) one or more actions 32, and can reference one or more
15 event filters 40. Moreover, actions sets 45 can be "chained" to invoke
16 subsequent action sets. Column 7, lines 46-50.

17
18 Thus, O'Brien discloses that *an event* is associated with one or more
19 actions via a mapping table. Nowhere does O'Brien evince the need for one event
20 to be converted into another event. To the contrary, O'Brien is concerned with
21 generating appropriate actions in response to specific events and apparently would
22 not benefit from the added complication of additional intermediate events in the
23 disclosed event-to-action association process.

24
25 The Office's *prima facie* case of obviousness fails for the further reason
that the Office has failed to provide a proper motivation to combine these
references. The Office bears to burden in an obviousness rejection of showing,
inter alia, that there is some suggestion or motivation, either in the references
themselves or in the knowledge generally available to one of ordinary skill in the
art, to modify the reference or to combine reference teachings. As such, the mere

1 fact that references *can* be combined or modified does not render a resultant
2 combination obvious unless the prior art also suggests the *desirability* of the
3 combination. See In re Mills, 916 F.2d 680, 682 (Fed. Cir. 1990). In the present
4 Application, the Office simply argues that it would be obvious to combine these
5 references in order to:

6
7 facilitate transforming and usage of event transformer because the
8 transforming would enhance converting one event into another event. The
9 event transformer would support implementing the converting. Another
10 converted event would be available for the system for processing. Office
11 Action at page 11.

12 However, this argument simply provides a possible *result* of the
13 combination and fails to explain why it would be *desirable* to combine O'Brien
14 and Bonnell. Applicant thus submits that this motivation is insufficient to support
15 an obviousness rejection under § 103.

16 Finally, Applicant submits that the Office's attempt to combine the feature
17 of "converting one event into another event" with the disclosure of O'Brien would
18 impermissibly change an operating principle of O'Brien. As explained above,
19 O'Brien discusses direct event-to-action mapping. Thus, the conversion of an
20 event into another event would needlessly complicate O'Brien and would be
21 contrary to its operating principle of direct event-to-action association.

22 Accordingly, and at least for the reasons discussed above, Applicant
23 submits that the Office has failed to establish a *prima facie* case of obviousness
24 based on the combination of O'Brien and Bonnell and respectfully requests that
25 the rejections based on this combination be withdrawn.

The Combination of Wold and Bonnell

In making out the rejection of claims 1-29 over the combination of Wold and Bonnell, the Office admits that Wold does not specifically mention the features of transforming an event or an event transformer. The Office then argues that Bonnell discloses these particular features and that the combination of Wold and Bonnell thus renders these claims obvious. Applicant respectfully disagrees and submits that the Office has failed to establish a *prima facie* case of obviousness based on this combination of references for at least the reasons discussed below.

First, Wold does not appear to suffer from any problem or deficiency that would require the addition of Bonnell. Wold discloses, among other things, a development system providing a property-method-event programming model for developing context-free reusable software components. With respect to Wold's handling of events, Wold explains that:

events flow along a chain of "listeners"--an "event chain." As shown in FIG. 7, the event of a menu selection may have to go to many receivers. The event is, in effect, passed along an event chain 710 to successive objects, some of which may elect to act upon the event. At the end of the chain (i.e., after the last member), the event dies or, alternatively, is passed back up the chain to the original sender. Wold at column 9, lines 58-65.

Thus, Wold has provided for event handling across its entire system via a *single event* following an "event chain" and would not benefit from "converting one event into another event", as argued by the Office.

The Office's *prima facie* case of obviousness fails for the further reason that the Office has failed to provide a proper motivation to combine these

1 references. As stated above, the Office bears the burden in an obviousness
2 rejection of showing, *inter alia*, that there is some suggestion or motivation, either
3 in the references themselves or in the knowledge generally available to one of
4 ordinary skill in the art, to modify the reference or to combine reference teachings.
5 As such, the mere fact that references *can* be combined or modified does not
6 render a resultant combination obvious unless the prior art also suggests the
7 *desirability* of the combination. See In re Mills, 916 F.2d 680, 682 (Fed. Cir.
8 1990). In the present Application, the Office simply argues that it would be
9 obvious to combine these references in order to:

10
11 facilitate transforming and usage of event transformer because the
12 transforming would enhance converting one event into another event. The
13 event transformer would support implementing the converting. Another
14 converted event would be available for the system for processing. Office
15 Action at page 32.

16 However, this argument simply provides a possible *result* of the
17 combination and fails to explain why it would be *desirable* to combine Wold and
18 Bonnell. Applicant thus submits that this motivation is insufficient to support an
19 obviousness rejection under § 103.

20 Finally, Applicant submits that the Office's attempt to combine the feature
21 of "converting one event into another event" with the disclosure of Wold would
22 impermissibly change an operating principle of Wold. As explained above, Wold
23 discusses that a *single* event flows along a chain of event listeners, who may
24 perform certain actions in response to the event. As such, the conversion of one
25 event into another event (thus two separate events) would be contrary to Wold's
teaching of a single event flowing along an event chain.

1 Accordingly, and at least for the reasons discussed above, Applicant
2 submits that the Office has failed to establish a *prima facie* case of obviousness
3 based on the combination of Wold and Bonnell and respectfully requests that the
4 rejections based on this combination be withdrawn.

5 6 **The Claims**

7 **Claim 1** recites a method comprising:

- 8
- 9 • receiving a first event at a first event filter, the first event filter
10 having an associated filter criteria;
 - 11 • applying the filter criteria associated with the first event filter to the
12 first event;
 - 13 • if the first event satisfies the filter criteria associated with the first
14 event filter, then:
 - 15 • transforming the first event into a second event; and
 - 16 • communicating the second event to a second event filter having an
17 associated filter criteria, the second event filter being associated with
18 an event consumer, wherein the event consumer performs an action
19 if the second event satisfies the filter criteria associated with the
20 second event filter.

21 In making out the rejection of this claim, the Office argues that its subject
22 matter is obvious over the combinations of O'Brien and Paquette, Wold and
23 Paquette, O'Brien and Bonnell and Wold and Bonnell. Applicant respectfully
24 disagrees and submits that, as explained above, the Office has failed to establish
25 the appropriateness of these combinations and has thus failed to establish a *prima facie* case of obviousness with respect to this claim. This claim is allowable.

Claims 2-10 depend from claim 1 and thus are allowable as depending
from an allowable base claim. These claims are also allowable for their own

1 recited features which, in combination with those recited in claim 1, are neither
2 disclosed nor suggested by the reference of record.

3 **Claim 11** recites a method comprising:

- 4
- 5 • receiving a first event having a first format;
- 6 • transforming the first event into a second event having a second
7 format, wherein transforming the first event into a second event
8 comprises:
- 9 • generating an event header having a plurality of parameters, wherein
10 the plurality of parameters are arranged in a standard data format;
11 and
- 12 • generating an event payload having a plurality of payload objects,
13 wherein the plurality of payload objects identify at least one action
14 to perform in response to the event.

15 In making out the rejection of this claim, the Office argues that its subject
16 matter is obvious over the combinations of O'Brien and Paquette, Wold and
17 Paquette, O'Brien and Bonnell and Wold and Bonnell. Applicant respectfully
18 disagrees and submits that, as explained above, the Office has failed to establish
19 the appropriateness of these combinations and has thus failed to establish a *prima*
20 *facie* case of obviousness with respect to this claim. This claim is allowable.

21 **Claims 12-15** depend from claim 11 and thus are allowable as depending
22 from an allowable base claim. These claims are also allowable for their own
23 recited features which, in combination with those recited in claim 11, are neither
24 disclosed nor suggested by the reference of record.

25 **Claim 16** recites an apparatus comprising:

- an event transformer to receive a first event and transform the first
event into a second event, the second event having a standard data
format regardless of the first event data format;

- a plurality of event filters coupled to the event transformer, the event filters to apply filter criteria to the second event; and
- a plurality of event consumers coupled to the plurality of event filters, the event consumers to perform an action if the second event satisfies the filter criteria applied by the event filters.

In making out the rejection of this claim, the Office argues that its subject matter is obvious over the combinations of O'Brien and Paquette, Wold and Paquette, O'Brien and Bonnell and Wold and Bonnell. Applicant respectfully disagrees and submits that, as explained above, the Office has failed to establish the appropriateness of these combinations and has thus failed to establish a *prima facie* case of obviousness with respect to this claim. This claim is allowable.

Claims 17-21 depend from claim 16 and thus are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 16, are neither disclosed nor suggested by the reference of record.

Claim 22 recites one or more computer-readable media having stored thereon a computer program that, when executed by one or more processors, causes the one or more processors to:

- receive a first event having a first data format;
- filter the first event using a first filter criteria;
- transform the first event into a second event having a second data format if the first event satisfies the first filter criteria, wherein the second data format includes an event header having a plurality of parameters and an event payload having a plurality of payload objects; and
- communicate the second event to an event action handler if the first event satisfies the first filter criteria.

1 In making out the rejection of this claim, the Office argues that its subject
2 matter is obvious over the combinations of O'Brien and Paquette, Wold and
3 Paquette, O'Brien and Bonnell and Wold and Bonnell. Applicant respectfully
4 disagrees and submits that, as explained above, the Office has failed to establish
5 the appropriateness of these combinations and has thus failed to establish a *prima*
6 *facie* case of obviousness with respect to this claim. This claim is allowable.

7 **Claims 23-29** depend from claim 22 and thus are allowable as depending
8 from an allowable base claim. These claims are also allowable for their own
9 recited features which, in combination with those recited in claim 22, are neither
10 disclosed nor suggested by the reference of record.

11
12 **Conclusion**

13 All of the claims are in condition for allowance. Accordingly, Applicant
14 requests a Notice of Allowability be issued forthwith. If the Office's next
15 anticipated action is to be anything other than issuance of a Notice of Allowability,
16 Applicant respectfully requests a telephone call for the purpose of scheduling an
17 interview.

18
19 Respectfully Submitted,

20
21 Dated: 7/21/06

22 By: 

Lance R. Sadler
Reg. No. 38,605
(509) 324-9256